

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION**

STATE OF TEXAS, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States

*Defendant,*

and

FRIENDS OF THE EARTH, et al.,

*Intervenor-Defendants.*

Case No. 9:25-cv-00010-MJT

**DECLARATION OF MARTHA COLLINS**

I, Martha Collins, declare as follows:

1. I am a resident of St. Petersburg, Florida. I am a member of and the Executive Director for Healthy Gulf. Healthy Gulf is a diverse network of individual citizens, local, regional, and national organizations whose purpose is to collaborate with and serve communities who love the Gulf of Mexico by providing research, communications, and coalition-building tools needed to reverse the long-pattern of over exploitation of the Gulf's natural resources. Healthy Gulf's main office is located in New Orleans.

2. I obtained my undergraduate degree from Tulane University before earning a Juris Doctorate from Seattle University and a Masters of Law in Environmental Law from Vermont Law School. I have been the Executive Director of Healthy Gulf since January 4, 2024 and have been a member and Board member of Healthy Gulf since 2016. In my role as Executive

Director, I am responsible for managing the day to day operations of Healthy Gulf and ensuring our mission statement is served, which includes protecting the Gulf.

3. Healthy Gulf works to promote a transition to clean energy, safeguard the health of the communities and the natural resources of Gulf of Mexico states through activism, public education, and legal action. As a member and as staff, I rely on Healthy Gulf to represent my interests in conserving coastal wetlands, marine water quality, and native species and their habitats, including protection of the Gulf of Mexico's fisheries, sea turtles, manatees, whales, deep water corals, and other marine life.

4. Healthy Gulf's membership includes people in Gulf states, and beyond, that live near, recreate in, and otherwise enjoy the coastal and marine waters of the Gulf of Mexico that are the subject of oil and gas exploration and development (in both state and federal waters) and are adversely affected by infrastructure associated with oil and gas development in the Gulf of Mexico.

5. Our members and partner groups in the Gulf of Mexico region sit at ground zero for the impacts of climate change—impacts that have been exacerbated by the operations of the oil and gas industry in the Gulf of Mexico. Healthy Gulf is dedicated to reducing the causes of and averting the worst impacts of climate change on communities in Gulf of Mexico states by resisting the expansion of the oil and gas industry, including refining and plastics production.

6. Since its creation, Healthy Gulf has engaged in efforts to require the offshore oil and gas industry in the Gulf of Mexico to reduce the industry's negative impact on the natural resources of the Gulf. In fact, Healthy Gulf has, for its 30-year history, been at the forefront of efforts to require that federal agencies fully assess the direct, indirect, and cumulative impacts of offshore oil and gas development on the natural resources of the Gulf of Mexico. We have

monitored the Bureau of Ocean Energy Management's (BOEM) compliance with the Outer Continental Shelf Lands Act, National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and Marine Mammal Protection Act (MMPA) requirements in relation to the continuing sale of leases for oil and gas development in the Gulf of Mexico.

7. In recent years, Healthy Gulf has challenged the federal government's continued sale of leases and approval of oil and gas operations, for its failure to comply with the Outer Continental Shelf Lands Act, NEPA, the ESA, and MMPA. *E.g.*, *Healthy Gulf v. U.S. Dep't of Interior*, No. 24-01024 (D.C. Cir. filed Feb. 12, 2024); *Healthy Gulf v. Haaland*, No. 23-02487 (D.D.C. filed Aug. 25, 2023); *Healthy Gulf v. Haaland*, No. 23-00604 (D.D.C. filed March 6, 2023); *Friends of the Earth v. Haaland*, No. 21-02317 (D.D.C. filed Aug. 31, 2021); *Healthy Gulf v. Bernhardt*, No. 19-00707 (D.D.C. filed Mar. 13, 2019); *Sierra Club v. Angelle*, No. 19-13966 (E.D. La. filed June 11, 2019); *Gulf Restoration Network v. Zinke*, No. 18-01674 (D.D.C. filed July 16, 2018); *Gulf Restoration Network v. Nat'l Marine Fisheries Serv.*, No. 18-01504 (M.D. Fla. filed June 21, 2018); *Nat. Res. Def. Council v. Salazar*, No. 10-01882 (E.D. La. filed June 30, 2010).

8. Healthy Gulf has also been at the forefront of efforts to address environmental degradation associated with oil and gas development and production from leased areas in the Western and Central Gulf of Mexico. For example, since our inception, we have monitored the destruction of thousands of acres of coastal wetlands, directly and indirectly, by oil and gas exploration, production, and development activities (e.g., navigation and pipeline canals). For example, we have reported numerous oil spills to the National Response Center, including the ongoing leak in Mississippi Canyon 20.

9. In the face of rising seas and increasing storms associated with climate change, the continuing loss of coastal wetlands associated with oil and gas industry activities in the Gulf of Mexico increases the vulnerability of the Gulf's coastal communities to rising seas and increasing intensity storms. We, therefore, resist projects that continue to destroy our wetlands, and advocate for backfilling existing oil and gas canals, and other efforts to restore coastal wetlands impacted by the oil and gas industry.

10. Healthy Gulf has engaged in review of various Five-Year Programs for Outer Continental Shelf (OCS) development and associated Programmatic Environmental Impact Statements, including through advocacy and comments on BOEM's analysis of the effects of leasing in multiple environmental impact statements. We have numerous staff who work on these issues, disseminating information, submitting comments, holding meetings and rallies, and mobilizing our members and supporters to comment and attend public hearings—all efforts to protect our communities from the impacts of OCS oil and gas development on our air, water, and coastal wetlands. Healthy Gulf was one of more than 50 Gulf Groups that sent a letter to the government applauding a 2021 pause on oil and gas leasing while urging it to cancel all scheduled offshore lease sales and establish a plan that protects Gulf communities' economies and environment.

11. Because we have seen the adverse impacts in already-leased areas of the Gulf, Healthy Gulf has also long been actively opposed to expansion of oil and gas leasing into the Eastern Gulf of Mexico. We supported the initial Congressional moratorium on leasing in those areas that expired in 2022 and have since been advocating for a permanent moratorium on exploration and development of oil and gas in this area. Protection of the Eastern Gulf is essential for maintaining the vast ecosystems of the Gulf, which include many endangered and

threatened species, which then in turn, maintain the multimillion dollar plus economies of the recreational and commercial fishing industries, the tourist industry and every other industry dependent upon a Healthy Gulf. The Eastern Gulf also plays a vital role in military training and testing for US national security interests. There will never be a good time to threaten the economic interests of the Eastern Gulf or the US military interests for National Security. The absence of permanent protections for these interests gives the impression these will not be stable interests going forward. The Eastern Gulf has already seen the dire impacts from the BP oil spill. Just the threat of a spill directly and significantly impacts the economic and military interests of the Eastern Gulf.

12. Based on the threats that oil and gas leasing and drilling pose to local economies and ecologies, the effort to permanently protect the Eastern Gulf has received bipartisan support from a broad swath of the public. For example, Congressional members from both sides of the aisle introduced the Protecting and Securing Florida's Coastline Act of 2019; legislation which Healthy Gulf supported and generated hundreds of emails from our members in support to members of the House of Representatives urging them to permanently protect the Eastern Gulf. Healthy Gulf has supported any and all protections of this area including the temporary withdrawals President Trump made.

13. Most recently and relevant to this case, Healthy Gulf engaged in multiple actions to encourage Present Biden to permanently protect multiple areas of the Gulf from expanded oil and gas leasing. We did an action alert last summer asking President Biden to act using 12(a), generating hundreds of emails to the president from our members and supporters. We signed onto a coalition letter to the president asking him to act, including withdrawing the Eastern Gulf. In all of our advocacy and outreach, we encouraged the president to be bold in protecting the

Eastern and even other parts of the Gulf.

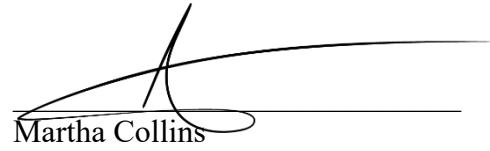
14. While not all of the areas we advocated to protect were included, the permanent protections for the Eastern Gulf in the January 6, 2025 withdrawal represent the culmination of years of our advocacy for these waters. Having this anchor of protection set in the Eastern Gulf also allows Healthy Gulf to continue to devote its efforts to secure a just transition away from drilling in the Western and Central Gulf, where up to 99% of the nation's offshore oil and gas drilling and production occurs.

15. I, and other Healthy Gulf staff and members, also have personal interests that we count on Healthy Gulf to help protect, and these interests would be directly harmed by the relief that the plaintiffs seek in this case. I and other Healthy Gulf staff regularly fly over and boat in the Gulf, both for research and personal enjoyment to appreciate the coast, marine habitat, and wildlife such as sea turtles, reef fish, seabirds, whales, dolphins, and other marine mammals. For example, I personally moved to Florida to be on the shores of the Eastern Gulf. I walk the beautiful beaches, swim in the waters, snorkel, dive, sail, boat and fish. This is our way of life.

16. President Biden's withdrawal of the Eastern Gulf protects all of these interests (mine as well as other Healthy Gulf members) by ensuring that oil and gas leasing—and the subsequent exploration and drilling activities that leasing enables—will be permanently absent from the Eastern Gulf. The relief plaintiffs seek in this case, if successful, would remove these permanent protections and reopen millions of acres of waters and coastlines from Alabama to the Florida Keys (and beyond) to the harms of oil and gas exploration, drilling, and production. It would also erase years of advocacy by Healthy Gulf and others to protect these waters for future generations. Plaintiffs' request to bar permanent protections from these waters directly and adversely harms my interests as well as those of Healthy Gulf and its other members.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated this 23rd day of April, 2025, in St. Petersburg, Florida.



Martha Collins